

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MARIA A. REEZE,)	
)	
Plaintiff,)	
)	No. 08 C 129
v.)	
)	Judge Hart
THE HOME DEPOT U.S.A., INC., d/b/a)	
THE HOME DEPOT,)	Magistrate Judge Brown
)	
Defendant		

MOTION TO EXTEND ALL DISCOVERY CLOSURE DATE

NOW COMES, the Defendant, THE HOME DEPOT U.S.A., INC., d/b/a THE HOME DEPOT, by and through its attorneys, PURCELL & WARDROPE, CHTD., and hereby respectfully moves this Honorable Court for an Order extending the All Discovery Closure Date, and in support thereof, states as follows:

1. The plaintiff, MARIA A. REEZE, has initiated the instant cause of action seeking recovery for injuries allegedly sustained in a trip and fall accident that occurred on December 23, 2005. Presently, an All Discovery Closure Date of June 30, 2008 has been entered by this Honorable Court.

2. The parties have actively pursued discovery, but were unable to schedule the plaintiff's deposition because of indications from plaintiff's healthcare providers that additional surgical options were being considered to address the plaintiff's injuries. Accordingly, the defendant re-noticed the plaintiff's deposition on two occasions to provide plaintiff the opportunity to determine if this was an aspect of the plaintiff's claim.

3. Currently, the plaintiff's deposition is scheduled to proceed on June 26, 2008. As of the filing of this Motion, it is unknown whether the deposition of the plaintiff will lead to the disclosure of additional individuals who will need to be deposed by the defendant.

4. The defendant will be greatly prejudiced if unable to proceed with relevant discovery following the deposition of the plaintiff.

5. Counsel for the defendant has discussed these issues with counsel for the plaintiff and both parties agree to the need for an extension of the All Discovery Closure Date.

WHEREFORE, the defendant, THE HOME DEPOT U.S.A., INC., d/b/a THE HOME DEPOT, prays that this Honorable Court will enter an Order extending the All Discovery Closure Date, in light of the later developments in the plaintiff's medical treatment and delays in being able to obtain the deposition of the plaintiff in order to allow the parties to complete all necessary discovery.

Respectfully submitted,

By: s/ Jason J. Friedl
Jason J. Friedl

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